

SEALED

FEB 05 2020

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY [Signature] DEPUTY CLERK

CRIMINAL NO.:

INDICTMENT

Ct. 1: 18 U.S.C. § 922(g)(1)

Felon in Possession of a Firearm

Ct. 2: 18 U.S.C. § 924(c)

Possession of a Firearm in Furtherance of Drug Trafficking Crime

Ct. 3: 26 U.S.C. § 5861(d)

Possession of an Unregistered Firearm

SA20CR0061 OG

COUNT ONE

[18 U.S.C. § 922(g)(1)]

On or about May 6, 2019, in the Western District of Texas, Defendant,

RICHARD MICHAEL VANN, JR.,

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed firearms and ammunition, to wit: a Glock GMBH 17GEN4, 9mm handgun, serial number BBVL330; a Smith & Wesson M&P Shield M2.0 Pistol, serial number JHJ6305; a Maverick Arms 88 12-gauge shotgun, serial number MV06774X; Century Arms International AK-63DS Rifle, Cal: 762, serial number AK63DS-F05996; a DPMS INC A15 Rifle, multi-caliber, serial number DKF500857; and a Huntertown Arms Guardian .22 caliber firearm suppressor, serial number 0222732, and the firearms had traveled in interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWO
[18 U.S.C. § 924(c)]

On or about May 6, 2019, in the Western District of Texas, Defendant,

RICHARD MICHAEL VANN, JR.,

did knowingly possess one or more firearms, to wit a Glock GMBH 17GEN4, 9mm handgun, serial number BBVL330; a Smith & Wesson M&P Shield M2.0 Pistol, serial number JHJ6305; a Maverick Arms 88 12-gauge shotgun, serial number MV06774X; Century Arms International AK-63DS Rifle, Cal: 762, serial number AK63DS-F05996; a DPMS INC A15 Rifle, multi-caliber, serial number DKF500857; and a Huntertown Arms Guardian .22 caliber firearm suppressor, serial number 0222732, during and in relation to, and did possess said firearm in furtherance of, a drug trafficking crime that may be prosecuted in a court of the United States, that is, Possession with Intent to Distribute methamphetamine, a Schedule I controlled substance, and marijuana, a Schedule I controlled substance, in violation of Title 21 United States Code Sections 841(a)(1) & (b)(1)(C), and in violation of Title 18, United States Code, Section 924(c).

COUNT THREE
[26 U.S.C. § 5861(d)]

On or about May 6, 2019, in the Western District of Texas, Defendant,

RICHARD MICHAEL VANN, JR.,

knowingly possessed a firearm, as defined by Title 26 United States Code Section 5845, to wit: a Huntertown Arms Guardian .22 caliber firearm suppressor, serial number 0222732, which was not then registered to him in the National Firearms Registration and Transfer Record, in violation of Title 26 United States Code Section 5861(d).

NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE
[See Fed. R. Crim. P. 32.2]

I.

Firearms Violations and Forfeiture Statutes

[Title 18 U.S.C. §§ 922(g)(1) and 924(c), subject to forfeiture pursuant to Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461]

As a result of the criminal violations set forth in Counts One and Two, the United States of America gives notice to Defendant **RICHARD MICHAEL VANN, JR.**, of its intent to seek the forfeiture of the properties described below upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461, which states:

Title 18 U.S.C. § 924. Penalties

(d)(I) Any firearm or ammunition involved in or used in any knowing violation of subsection . . . (g) . . . of section 922 . . . or knowing violation of section 924 . . . shall be subject to seizure and forfeiture . . . under the provisions of this chapter. . .

This Notice of Demand for Forfeiture includes but is not limited to the following properties:

1. Smith & Wesson M&P Shield M2.0 Pistol, Cal: 9, SN JHJ6305;
2. Maverick Arms 88 Shotgun, Cal: 12, SN MV06774X;
3. Century Arms International AK-63DS Rifle, Cal: 762, SN: AK63DS-F05996
4. DPMS INC A15 Rifle, Cal: Multi, SN: DKF500857;
5. Glock GMBH 17GEN4 Pistol, Cal: 9, SN: BBVL330; and


6. Any and all firearms, ammunition, and/or accessories involved in or used in the commission of the criminal offenses.

A TRUE BILL


FOREPERSON OF THE GRAND JURY

JOHN F. BASH
UNITED STATES ATTORNEY

BY:


MATTHEW W. KINSKEY
Assistant United States Attorney